

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

APR 26 2004

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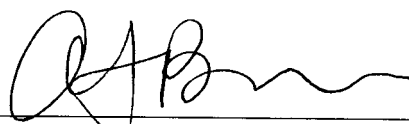
Connelly Management, Inc., <i>et al.</i> ,)	Civil Action No.: 2:02-2440-23B6
)	
Plaintiffs,)	
)	
vs.)	DEFENDANT MID-SOUTH
)	BENEFITS GROUP, JAMES A.
Ferguson Marketing Group, Inc.,)	GLIDEWELL, KAY GLIDEWELL,
<i>et. al.</i> ,)	AND BRIAN S. GLIDEWELL'S
)	MOTION TO STAY THE PRESENT
Defendants.)	CIVIL ACTION
)	

Defendants Mid-South Benefits Group, James A. Gildewell, Kay Glidewell, and Brian S. Glidewell (collectively, "the Mid-South Defendants") hereby move the Court for an Order staying the present action. The grounds for this motion are as follows. On June 4, 2002, Plaintiffs commenced an action against the Defendants alleging that the Defendants conspired with each other with the purpose and intent to create, market, solicit, sell and administer an illegal, unauthorized and unregulated health insurance product which allegedly failed to perform as represented and left hundreds of citizens of this State without health insurance benefits. On March 24, 2004, a Texas grand jury indicted two of the Mid-South Defendants on a variety of counts, including conspiracy, arising out of and involving the same facts alleged in Plaintiffs' Complaint. Because a criminal proceeding is pending arising from the same set of facts as are alleged in Plaintiffs' Complaint, the interests of justice warrant that this Court exercise its discretion and stay this matter until the criminal proceeding pending against the Mid-South Defendants is resolved.

This Motion is based upon the pleadings and materials of record herein, the memorandum of law filed contemporaneously herewith, the applicable law, and such other and further materials and authorities as may be submitted hereafter.

Pursuant to Rule 11 of the Federal Rules of Civil Procedure, the undersigned affirms that he has consulted with plaintiffs' counsel prior to the filing of this motion and that no agreement on the issues contained herein could be reached.

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

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Brian S. Glidewell**

Columbia, South Carolina

April 23, 2004

CERTIFICATE OF SERVICE

I, the undersigned Administrative Assistant, of the law offices of Sowell Gray Stepp & Laffitte, L.L.C., attorneys for defendants Client Development Services, Inc. d/b/a Mid-South Benefits Group, James A. Glidewell, Brian S. Glidewell and Kay Glidewell, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

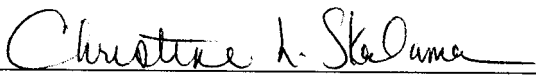
DEFENDANT MID-SOUTH BENEFITS GROUP, JAMES A. GLIDEWELL, KAY GLIDEWELL, AND BRIAN S. GLIDEWELL'S MOTION TO STAY THE PRESENT CIVIL ACTION

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April 23, 2004